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July 8, 2024

VIA ECF

The Honorable Valerie Figueredo, U.S.M.J.
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1660
New York, NY 10007

Re: GateGuard, Inc. v. Amazon.com, Inc., No. 21 Civ. 9321 (JGK) (VF)

Dear Judge Figueredo:

Pursuant to Rule I.g.2 of the Court's Individual Practices in Civil Cases, Amazon respectfully submits this letter-motion to provisionally file under seal its forthcoming opposition to Plaintiff GateGuard's June 28, 2024 letter in further support of its motion for leave to amend its complaint (ECF No. 197).

Amazon does not believe any of these materials must be permanently filed under seal. However, Amazon's filing discusses and attaches discovery materials GateGuard has marked as confidential. In an abundance of caution, Amazon is submitting its filing under seal in the first instance, so that GateGuard may have an opportunity to articulate what materials it believes are appropriate for sealing. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 124 (2d Cir. 2006).

We thank the Court for its consideration.

Respectfully submitted,

/s/ David Salant
David Salant

CC: All counsel of record (via ECF)

MEMO ENDORSED



HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

DATED: July 10, 2024

The provisional seal requested herein is granted. The Clerk of Court is directed to maintain the viewing restrictions on ECF No. 204 until July 24, 2024. The Clerk of Court is also respectfully directed to terminate the Motion at ECF No. 203.